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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

I. HEADING

DATE: February 20, 1998

SUBJECT: GHR Foundry Site, Dayton, Montgomery County, Ohio
Responsible Party Removal Action

FROM: Paul Steadman, OSC, USEPA, Region 5, ERB, ERS-III

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POLREP No: POLREP #2 and FINAL

II. BACKGROUND

SITE ID#: A539
RESPONSIBLE AUTHORITY: CERCLA
NPL STATUS: Non-NPL
START DATE: May 22, 1997
AOC DATE: February 25, 1997
PRP COMPLETION DATE: January 6, 1998

III. SITE INFORMATION

A. Incident Category

Inactive Production Facility

B. Site Description

1. Site location

The GHR site is an abandoned grey iron castings foundry located at 400 Detrick Street in an industrial/commercial section of Dayton, Montgomery County, Ohio. The geological coordinates for the site are latitude 39°46'10" North and longitude 84°10'53" West. The GHR site is bordered to the north by a ditch and State Route 4, to the east by railroad tracks, to the south by the Mad River, and to the west by Digitron Corporation. The 11.8-acre property contained a 190,000 square foot (ft^2) main building (Plant H), a 86,000 ft^2 core manufacturing building (Plant G), and a 5,700 ft^2 office building. The GHR site was in operation from approximately 1946 until early 1983.

After 1983, the foundry stood vacant until it was purchased in 1988 from Amcast Industrial Corporation by

Ohio Industrial Trading Company, in a joint venture between Foundry Sales and Supply, Inc., and John Paul Enterprises. The foundry equipment was removed for remanufacturing and resale. Usage of the property shifted from strictly industrial to recovering and recycling scrap metals from large electrical transformers and capacitors. As a result of this activity, numerous transformers and capacitors containing polychlorinated biphenyl (PCB)-containing oil were left on site, presenting a threat to public health and the environment.

Beginning in 1991, the Ohio Environmental Protection Agency (OEPA) commenced a series of PCB compliance inspections of the GHR facility. These inspections resulted in the U.S. EPA conducting a Determination of Compliance Inspection of the GHR facility on June 17, 1991. As a result of the inspection, a 20 count complaint was issued to the PRPs. The complaint ranged from the improper storage and marking of containers to the improper use and disposal of PCBs. The PRPs for the GHR site are John Peloquin of John Paul Enterprises and Foundry Sales and Supply, Inc.; and Ray Carcione and Pete Lloyd of The Ohio Industrial Trading Company.

Operations at the GHR facility ceased in 1993, leaving the site with partially demolished buildings, and partially segregated demolition debris.

2. Description of threat

On May 3, 1996, U.S. EPA issued a Toxic Substances and Control Act (TSCA) Violation Complaint against the PRPs.

Site investigations conducted by U.S. EPA on April 10 and October 15, 1996, documented the following wastes on site: asbestos-containing pipe wrapping and transite building materials in the office building; pressurized gas cylinders mixed within demolition debris throughout the site; numerous bags of asbestos-containing material (ACM) in the storage room (Room G) of Plant G; drums and capacitors labelled as containing PCBs in Room G, approximately five transformers on the second floor and ten transformers on the first floor of Plant G; and approximately thirty drums containing unknown liquid on the first floor of Plant G. In addition, six underground storage tanks (USTs) with capacities ranging from 2,000 to 20,000 gallons containing liquids and semi-solids were found to be located within the northern third of the GHR site.

B. Preliminary Assessment/Site Inspection Results

On September 11, 1996, a General Notice of Potential Liability letter (Section 107a) concerning Comprehensive Environmental Response, Compensation, and Liability Act violations was sent to the PRPs. The PRPs replied on January 21, 1997. A plan was agreed upon with the PRPs and U.S. EPA to undertake certain and specified response actions to remove the drums of ignitable liquids, asbestos, and PCB-containing transformers and capacitors on site. As a result of these agreements and negotiations, an Administrative Order by Consent (AOC) was issued on February 25, 1997.

IV. RESPONSE INFORMATION

A. Situation

1) Current Situation

A final AOC Compliance inspection and walkthrough of the facility was conducted by USEPA, START, and representatives from the City of Dayton, OEPA, and the PRP contractor, Roy F. Weston, Inc., on February 18, 1998. The PRPs and their legal counsel were invited to participate in the final walkthrough but were unable to attend. The representatives from the City of Dayton and OEPA stated to USEPA that they were satisfied with the cleanup efforts conducted by the PRPs.

2) Removal activities to date

The following PRP removal activities were conducted from May 22, 1997 to January 6, 1998.

From May 21 through 29, 1997, Weston's asbestos abatement subcontractor, American Environmental, Inc., loaded approximately six 30-yard rolloff boxes with asbestos-containing transite building materials from the office building and transported the material as a special waste for disposal at the Rumpke Landfill, in Cincinnati, Ohio.

From May 22 through 30, 1997, Weston sampled thirty-four drums from the first floor of Plant G, two above-ground storage tanks (ASTs), and six USTs. Weston conducted field screening of each drum by using a photoionization detector followed by a specific gravity check. A composite sample of all substances which exhibited similar field screening results was prepared and submitted to a laboratory for RCRA characterization analysis and PCB content analysis. A composite sample of the drums located in Room G was also sent for laboratory analysis.

On May 30, 1997, the removal of friable ACM began within the office building. Negative air machines coupled with full containment were used to prevent the escape of asbestos particles during the abatement activities. Background area and personal air sampling was conducted by an independent contractor, Helix Environmental.

From June 2 through 21, 1997, asbestos abatement activities were conducted within the office building. In addition, all previously bagged ACM located and stored in Room G by the PRP, were removed for disposal. ACM from both the office building and Room G filled three 40-yard rolloff boxes. All ACM was transported to the Rumpke Landfill, Cincinnati, Ohio, for disposal.

During the first week of June 1997, a total of sixteen gas cylinders were transported off site. The cylinders were cleaned, tested, and reused by their respective suppliers.

On June 11, 1997, aggressive clearance sampling was conducted by Helix Environmental within the office building. The process involved the use of compressed air to attempt to dislodge any free particles that adhered to the interior structures. Any dislodged particles were then captured on a filter using a vacuum pump, and analyzed for total airborne particulate concentration. Clearance sample results confirmed that the building was free of loose ACM. In addition, five transformers were removed from the second floor of Plant G using a crane and were staged for future disposal with the ten transformers located on the first floor of Plant G.

On June 20, 1997, laboratory analytical results from samples collected by Weston from drums located on the first floor of Plant G and the USTs indicated no levels of PCBs. Weston classified the drums using the laboratory analytical data into the following two waste streams: Resource Conservation and Recovery Act (RCRA) ignitable liquid and non-regulated oil.

On June 23, 1997, Weston's RCRA/TSCA/Non-regulated waste contractor, Laidlaw, Inc., was on site to collect oil from approximately forty-nine drums labelled as containing PCBs located in Room G. Coolant from a transformer analyzed during the April 10, 1996, site assessment was found to contain PCBs at a concentration of 43 parts per million (ppm) and was included in that shipment. Approximately 2,500 gallons of PCB oil was transported to Laidlaw's Twinsburg, Ohio, facility.

On June 24, 1997, fifteen transformers, fifty-two capacitors located in Room G; three oil-filled switches, and forty-nine 55-gallon drums that had been emptied of PCB-containing oil the previous day; and miscellaneous debris such as light ballasts, personal protective equipment, and sorbant associated with the PCB removal activities, were transported to Laidlaw's Twinsburg, Ohio, facility for disposal.

Six 55-gallon drums from the floor of Plant G and one drum from Room G of oily dirt and solids were containerized from July 1 through 14, 1997. A sample of each was collected by Weston and sent to a local laboratory for analysis and characterization.

On July 8, 1997, Weston's construction debris subcontractor, Steve R. Rauch, Inc., began loading and removing miscellaneous construction debris. Three additional gas cylinders were discovered during the debris removal and were sent to local gas suppliers for reuse.

On July 14, 1997, oil and water was found to be leaking from a piece of equipment on the Plant H foundation. Approximately 22 tons of impacted soil was loaded onto a truck and sent to Petro Environmental, Inc., for treatment and disposal. Analytical results showed a total PCB concentration of less than 50 ppm.

On July 29, 1997, construction debris removal was completed.

On July 30, 1997, U.S. EPA conducted a meeting on site to discuss future activities. Attendees included: Donna Gorby-Lee from the City of Dayton; Isaac Wilder and Ralph McGinnis of OEPA; START; and Weston Project Manager Michael May.

Laboratory analysis of the drums of oily dirt and solids from the floor Plant G showed PCB concentrations of less than 1 ppm. Analysis of the one drum of oily dirt solids collected in Room G showed a PCB concentration of 2,380 ppm. Additional remedial attention may be required on the floor in Room G in order to satisfy a 10 milligram per 100 square centimeter PCB cleanup level for the site established by OEPA. Remedial activities in this area as well as other areas will be addressed under the Ohio Voluntary Action program.

On August 4, 1997, approximately 700 gallons of non-regulated oil and water were sent to Laidlaw's Hilliard, Ohio, facility for disposal. Approximately twelve drums of non-regulated debris from Plant G, 36 empty drums, one empty AST and nine 55-gallon drums of ignitable liquids were shipped to Laidlaw's Greenbriar, Tennessee, facility. In addition, approximately 20 yards of PCB debris were shipped to Laidlaw's Twinsburg, Ohio facility for disposal.

On August 22, 1997, site security was discontinued.

On October 16, 1997, two 55-gallon drums of non-regulated solids were transported to Laidlaw's Greenbriar, Tennessee facility for disposal. All removal tasks required by U.S. EPA as stated in the AOC have been completed.

In November and December of 1997, the PRP contractor conducted an extent of contamination (EOC) survey over the site area to determine unknown, missed, or additional hazardous constituents.

On January 6, 1998, the PRP contractors demobilized from the site. All tasks as stated to be completed in the AOC have been addressed by the PRPs.

B. Planned Removal Activities

All PRP removal activities have been completed as stated in the Administrative Order by Consent.

C. Next Steps

1) Receive final report from PRPs.
2) The PRPs have submitted the necessary UST permits and are awaiting final approval from the City of Dayton Fire Marshall to proceed with removing the USTs.

D. Costs

No cost information has been generated to date; however, the USEPA has it stipulated that cost recovery for its oversight expenses will be reimbursed by the PRPs.